

EXHIBIT B

From: Dalsen, William D. <wdalsen@proskauer.com>
Sent: Saturday, June 15, 2019 1:36 PM
To: Sloane, Cheryl Tedeschi
Cc: Dale, Margaret A.; Papez, Matthew E.; Sushon, Bill; mpocha@omm.com; Stewart, Geoffrey S.; Sooknanan, Sparkle L.; Fox, David R.; Green, Jesse; Perez, Isel M.; Raiford, Landon S.; Bassett, Nicholas; DeGenaro, Stephen M.; Mazurek, Carl A.
Subject: RE: June 6, 2019 Order re privilege assertions

Cheryl —

We have reviewed the Oversight Board's amended and supplemental privilege log we served on June 12, 2019 in view of the examples you provided on our call yesterday (viz. the deliberative-process assertions referenced on pp. 9-10 of Movants' opening brief on their motion to compel the Oversight Board on privilege issues; and Privilege Entries 9, 10, 44, and 176), along with the documents redacted or withheld as reflected in those entries and Ms. Jaresko's declaration of June 13, 2019. Following that review:

1. To be clear, we are no longer asserting any privileges over the information reflected in Privilege Entries 114 and 115, as reflected in the blanks for privileges asserted in those rows. The information previously withheld reflected in those entries was produced to you on June 12.
2. The Oversight Board will withdraw only its assertion of work product protection as to Privilege Entry 176. It will not withdraw its assertion of the attorney-client privilege and the deliberative process privilege as to Privilege Entry 176.
3. The Oversight Board otherwise stands on its June 12 privilege log, supplemental production, and supplemental declaration in response to the Court's June 6, 2019 order.

We will send a revised log to reflect the deletion of Privilege Entries 114 and 115, and the withdrawal of work-product protection as to Privilege Entry 176.

—Will

William D. Dalsen
Attorney at Law

[Proskauer](#)
One International Place
Boston, MA 02110-2600
d 617.526.9429
f 617.526.9899
wdalsen@proskauer.com

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Please consider the environment before printing this email.

From: Dalsen, William D. <wdalsen@proskauer.com>
Sent: Friday, June 14, 2019 5:51 PM
To: Sloane, Cheryl Tedeschi <csloane@whitecase.com>
Cc: Dale, Margaret A. <mdale@proskauer.com>; Papez, Matthew E. <mpapez@jonesday.com>; Sushon, Bill <wsushon@omm.com>; mpocha@omm.com; Stewart, Geoffrey S. <gstewart@jonesday.com>; Sooknanan, Sparkle L.

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Subject: Re: June 6, 2019 Order re privilege assertions

Cheryl —

This is OK to sign and file. If your local counsel could handle filing I'd much appreciate it.

Thanks,

—Will

William D. Dalsen

Attorney at Law

Proskauer

One International Place

Boston, MA 02110-2600

d 617.526.9429

f 617.526.9899

wdalsen@proskauer.com

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On Jun 14, 2019, at 4:57 PM, Sloane, Cheryl Tedeschi <csloane@whitecase.com> wrote:

Will,

As we just discussed, I'm sending you the Bondholder's mark up and ask that you let us know whether you'll be making any further changes to your section before filing. Further, we agreed that in the event the Bondholders file a motion to compel, FOMB will send serve the Court with copies of Ms. Jaresko's supplemental declaration and the June 12th priv log.

Thank you,
Cheryl

Cheryl Sloane | Associate

T +1 305 925 4783 M +1 786 457 4984 E csloane@whitecase.com

White & Case LLP | Southeast Financial Center

200 South Biscayne Boulevard, Suite 4900 | Miami, FL 33131-2352

From: Dalsen, William D. <wdalsen@proskauer.com>

Sent: Friday, June 14, 2019 4:20 PM

To: Sloane, Cheryl Tedeschi <csloane@whitecase.com>; Dale, Margaret A. <mdale@proskauer.com>;

'Papez, Matthew E.' <mpapez@jonesday.com>

Cc: Sushon, Bill <wsushon@omm.com>; mpocha@omm.com; Stewart, Geoffrey S.

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DeGenaro, Stephen M. <sdegenaro@jonesday.com>; Mazurek, Carl A. <cmazurek@proskauer.com>

Subject: RE: June 6, 2019 Order re privilege assertions

Cheryl —

The Oversight Board has not withheld information on the grounds other Respondent parties had already produced it.

--Will

William D. Dalsen

Attorney at Law

[Proskauer](#)

One International Place

Boston, MA 02110-2600

d 617.526.9429

f 617.526.9899

wdalsen@proskauer.com

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From: Sloane, Cheryl Tedeschi <csloane@whitecase.com>

Sent: Friday, June 14, 2019 3:41 PM

To: Dalsen, William D. <wdalsen@proskauer.com>; Dale, Margaret A. <mdale@proskauer.com>; 'Papez, Matthew E.' <mpapez@jonesday.com>

Cc: Sushon, Bill <wsushon@omm.com>; mpocha@omm.com; Stewart, Geoffrey S. <gstewart@JonesDay.com>; Sooknanan, Sparkle L. <ssooknanan@jonesday.com>; Fox, David R. <drfox@jonesday.com>; Green, Jesse <jgreen@whitecase.com>; Perez, Isel M. <iperez@jonesday.com>; Raiford, Landon S. <LRaiford@jenner.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; DeGenaro, Stephen M. <sdegenaro@jonesday.com>; Mazurek, Carl A. <cmazurek@proskauer.com>

Subject: RE: June 6, 2019 Order re privilege assertions

Will,

We had hoped we could do a straight-forward joint status report regarding the undisputed facts (timely service of logs, production and supplemental declaration) and the fact that the parties meet and conferred, etc., but since FOMB's has drafted a position, we will do so as well.

In the interim, can you please respond to p.11 of the Court's order and advise whether FOMB has withheld information based on a belief that such information had already been produced by other Respondents?

Thank you,
Cheryl

Cheryl Sloane | Associate

T +1 305 925 4783 M +1 786 457 4984 E csloane@whitecase.com

White & Case LLP | Southeast Financial Center

200 South Biscayne Boulevard, Suite 4900 | Miami, FL 33131-2352

From: Dalsen, William D. <wdalsen@proskauer.com>

Sent: Friday, June 14, 2019 2:35 PM

To: Sloane, Cheryl Tedeschi <csloane@whitecase.com>; Dale, Margaret A. <mdale@proskauer.com>; 'Papez, Matthew E.' <mpapez@jonesday.com>

Cc: Sushon, Bill <wsushon@omm.com>; mpocha@omm.com; Stewart, Geoffrey S. <gstewart@JonesDay.com>; Sooknanan, Sparkle L. <ssooknanan@jonesday.com>; Fox, David R. <drfox@jonesday.com>; Green, Jesse <jgreen@whitecase.com>; Perez, Isel M. <iperez@jonesday.com>; Raiford, Landon S. <LRaiford@jenner.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; DeGenaro, Stephen M. <sdegenaro@jonesday.com>; Mazurek, Carl A. <cmazurek@proskauer.com>

Subject: RE: June 6, 2019 Order re privilege assertions

Cheryl –

Following up on our call this morning, attached please find a draft joint status report for your review and additions.

--Will

William D. Dalsen

Attorney at Law

[Proskauer](#)

One International Place
Boston, MA 02110-2600

d 617.526.9429

f 617.526.9899

wdalsen@proskauer.com

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Please consider the environment before printing this email.

From: Dalsen, William D.

Sent: Friday, June 14, 2019 9:10 AM

To: 'Sloane, Cheryl Tedeschi' <csloane@whitecase.com>; Dale, Margaret A. <mdale@proskauer.com>;

'Papez, Matthew E.' <mpapez@jonesday.com>

Cc: Sushon, Bill <wsushon@omm.com>; mpocha@omm.com; Stewart, Geoffrey S.

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Subject: RE: June 6, 2019 Order re privilege assertions

Cheryl –

The documents in that Bates range had been on the prior logs but were either removed entirely or produced with redactions. Here are cross-references for the beginning Bates numbers for documents in that range that have now been produced with redactions:

- Privilege ID 86 (FOMB_ERS_00009750)
- Privilege ID 155 (FOMB_ERS_0001133)
- Privilege ID 183 (FOMB_ERS_00010035)
- Privilege ID 276 (FOMB_ERS_00010037)
- Privilege ID 294 (FOMB_ERS_00010039)

--Will

William D. Dalsen

Attorney at Law

[Proskauer](#)

One International Place
Boston, MA 02110-2600

d 617.526.9429

f 617.526.9899

wdalsen@proskauer.com

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Sent: Thursday, June 13, 2019 7:43 PM
To: Dalsen, William D. <wdalsen@proskauer.com>; Dale, Margaret A. <mdale@proskauer.com>; 'Papez, Matthew E.' <mpapez@jonesday.com>
Cc: Sushon, Bill <wsushon@omm.com>; mpocha@omm.com; Stewart, Geoffrey S. <gstewart@JonesDay.com>; Sooknanan, Sparkle L. <ssooknanan@jonesday.com>; Fox, David R. <drfox@jonesday.com>; Green, Jesse <jgreen@whitecase.com>; Perez, Isel M. <iperez@jonesday.com>; Raiford, Landon S. <LRaiford@jenner.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; DeGenaro, Stephen M. <sdegenaro@jonesday.com>; Sloane, Cheryl Tedeschi <csloane@whitecase.com>
Subject: RE: June 6, 2019 Order re privilege assertions

Will,

We wanted to raise a question in advance of our call tomorrow so you can hopefully give it some thought in advance. Can you please confirm that the 16 documents produced at Bates Range: FOMB_ERS_00009750 through FOMB_ERS_00010043 were listed on the April 29 or May 1 privilege logs but have been removed from the June 12 privilege log? It is unclear given the fact that these 16 documents appear to have new bates that have no relation to the three privilege logs.

Thanks,
Cheryl

Cheryl Sloane | Associate
T +1 305 925 4783 M +1 786 457 4984 E csloane@whitecase.com
White & Case LLP | Southeast Financial Center
200 South Biscayne Boulevard, Suite 4900 | Miami, FL 33131-2352

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Subject: RE: June 6, 2019 Order re privilege assertions

That works. Talk to you then.

--Will

William D. Dalsen
Attorney at Law

[Proskauer](#)
One International Place
Boston, MA 02110-2600
d 617.526.9429

f 617.526.9899

wdalsen@proskauer.com

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Raiford, Landon S. <LRaiford@jenner.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>

Subject: RE: June 6, 2019 Order re privilege assertions

How about 10:00 a.m.? We can use the following dial-in:

Toll Free: +1-877-716-2582

Participant PIN Code: 894 83 262#

Cheryl Sloane | Associate

T +1 305 925 4783 M +1 786 457 4984 E csloane@whitecase.com

White & Case LLP | Southeast Financial Center

200 South Biscayne Boulevard, Suite 4900 | Miami, FL 33131-2352

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Raiford, Landon S. <LRaiford@jenner.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>

Subject: RE: June 6, 2019 Order re privilege assertions

Cheryl –

I can speak tomorrow morning or early afternoon, but have a hard stop at 2:45 p.m. Eastern. Let me know what works on your end.

--Will

William D. Dalsen

Attorney at Law

[Proskauer](http://Proskauer.com)

One International Place

Boston, MA 02110-2600

d 617.526.9429

f 617.526.9899

wdalsen@proskauer.com

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To: Sloane, Cheryl Tedeschi <csloane@whitecase.com>; 'Papez, Matthew E.' <mpapez@jonesday.com>
Cc: Sushon, Bill <wsushon@omm.com>; mpocha@omm.com; Stewart, Geoffrey S. <gstewart@JonesDay.com>; Sooknanan, Sparkle L. <ssooknanan@jonesday.com>; Fox, David R. <drfox@jonesday.com>; Green, Jesse <jgreen@whitecase.com>; Perez, Isel M. <iperez@jonesday.com>; Raiford, Landon S. <LRaiford@jenner.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; Dalsen, William D. <wdalsen@proskauer.com>
Subject: RE: June 6, 2019 Order re privilege assertions

Cheryl,
We expect it soon. I just sent another reminder.
I will check with Will, as I expect he is covering tomorrow's call.

Margaret A. Dale
Partner and Vice Chair, Litigation Department

Proskauer
Eleven Times Square
New York, NY 10036-8299
d 212.969.3315
f 212.969.2900
mdale@proskauer.com

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Subject: RE: June 6, 2019 Order re privilege assertions

Margaret and Will,

Please advise when we can expect to receive Ms. Jaresko's supplemental declaration. Also, please let us know what time tomorrow morning you are available for a call to have a meet / confer re: the joint status report that is due.

Thanks,
Cheryl

Cheryl Sloane | Associate
T +1 305 925 4783 M +1 786 457 4984 E csloane@whitecase.com
White & Case LLP | Southeast Financial Center
200 South Biscayne Boulevard, Suite 4900 | Miami, FL 33131-2352

From: Dale, Margaret A. <mdale@proskauer.com>
Sent: Wednesday, June 12, 2019 9:04 PM
To: 'Papez, Matthew E.' <mpapez@jonesday.com>
Cc: Sushon, Bill <wsushon@omm.com>; mpocha@omm.com; Stewart, Geoffrey S. <gstewart@JonesDay.com>; Sooknanan, Sparkle L. <ssooknanan@jonesday.com>; Fox, David R. <drfox@jonesday.com>; Sloane, Cheryl Tedeschi <csloane@whitecase.com>; Green, Jesse <jgreen@whitecase.com>; Perez, Isel M. <iperez@jonesday.com>; Raiford, Landon S. <LRaiford@jenner.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; Dalsen, William D. <wdalsen@proskauer.com>
Subject: June 6, 2019 Order re privilege assertions

Matt,

Later this evening, based on our re-review of the documents on the Oversight Board's privilege logs pursuant to the Court's June 6 Order, we will (1) serve a revised privilege log and (2) produce additional documents for which we are no longer asserting any privilege. Also, we are awaiting Natalie Jaresko's signature on a supplemental declaration concerning the assertion of the deliberative process privilege. As I mentioned on the telephone this morning, given the tight timeframe we had to accomplish the re-review, we do not expect to receive Ms. Jaresko's signed declaration tonight. We will follow up with you tomorrow when we have a better sense of the timing on Ms. Jaresko's declaration. We apologize for the timing.

Margaret

Margaret A. Dale

Partner and Vice Chair, Litigation Department

[Proskauer](#)

Eleven Times Square
New York, NY 10036-8299
d 212.969.3315
f 212.969.2900
mdale@proskauer.com

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